

**FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

(1) Jonathan A. Brownlee III  
(Name of Plaintiff) (Inmate Number)  
Lackawanna County Prison  
1371 N Washington Ave Scranton, PA 18501  
(Address)

(2) \_\_\_\_\_  
(Name of Plaintiff) (Inmate Number)  
  
(Address)

(Each named party must be numbered,  
and all names must be printed or typed)

vs.

(1) United States of America  
(2) \_\_\_\_\_  
(3) \_\_\_\_\_  
(Names of Defendants)

(Each named party must be numbered,  
and all names must be printed or typed)

1:18cv1319  
(Case Number)

**CIVIL COMPLAINT**

**FILED  
SCRANTON**

JUN 29 2018  
PER JH  
DEPUTY CLERK

TO BE FILED UNDER:  42 U.S.C. § 1983 - STATE OFFICIALS  
 28 U.S.C. § 1331 - FEDERAL OFFICIALS

**I. PREVIOUS LAWSUITS**

- A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

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## II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution?  Yes  No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims?  Yes  No
- C. If your answer to "B" is Yes:
1. What steps did you take? \_\_\_\_\_  
\_\_\_\_\_
  2. What was the result? \_\_\_\_\_  
\_\_\_\_\_
- D. If your answer to "B" is No, explain why not: The claim does not involve an event that occurred within a correctional facility.

## III. DEFENDANTS

(1) Name of first defendant: United States of America

Employed as \_\_\_\_\_ at \_\_\_\_\_  
Mailing address: \_\_\_\_\_

(2) Name of second defendant: \_\_\_\_\_  
Employed as \_\_\_\_\_ at \_\_\_\_\_  
Mailing address: \_\_\_\_\_

(3) Name of third defendant: \_\_\_\_\_  
Employed as \_\_\_\_\_ at \_\_\_\_\_  
Mailing address: \_\_\_\_\_

(List any additional defendants, their employment, and addresses on extra sheets if necessary)

## IV. STATEMENT OF CLAIM

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets if necessary.)

1. A Pocono Mountain Regional Police dept. police officer made a faulty investigation where the officer concluded that the Plaintiff violated Meagan's Law by not registering that his employment terminated. The investigating officer arrested

the Plaintiff. The Plaintiff was innocent, unnecessarily imprisoned for about 1 year

2. After suffering about 1 year of unnecessary imprisonment waiting for his 1<sup>st</sup> day of trial, it was formally confirmed that the Plaintiff's imprisonment for about 1 year was in fact unnecessary when the judge ruled that the Plaintiff was "Not Guilty" of the Meagan's Law violation charge that had been imposed upon him
3. by the United States of America. The police dept. employed an officer insufficiently trained in investigating. I suffered (about) 1 year of unnecessary imprisonment "only because of the US Government's doings and absolutely none" of my own doing. After waiting (about) 1 year for trial, the court "confirmed" that I was Not Guilty of the charge the United States of America initially alleged and is "FAULTY" for my suffering.

V. RELIEF

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. I request money damages compensation in the amount of \$80 Million Dollars.
2. And, I request a judgement which causes me to no longer be required to register for Meagan's Law.
3. \_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 24<sup>th</sup> day of June, 2018.

  
(Signature of Plaintiff)

Extra Sheets continued for Jonathan Brownlee III's  
Form to be used by a prisoner in filing a Civil Rights Complaint vs MCLCF

## II. Exhaustion of Administrative Remedies.

Concerning the prisoner grievance procedure as it relates to fully exhausting available administrative remedies for Monroe County Correctional Facility, Stroudsburg, PA.

I, Jonathan A. Brownlee, the Plaintiff am aware of the grievance procedure process and how it escalates.

In relation to IV the Statement of the Claim, the farthest point that administrative remedies could be exhausted was a grievance form/request slip already in my possession. This is because, I over-heard Correctional Officers saying that they were going to move me into a cell with a sexually threatening inmate. I took it upon myself to verbally and by request slip (on hand) request that I am not moved in with the threatening inmate. This administrative remedy is all that there was time to file, (the request slip), moments/minutes later I was moved in to the cell with the rapist inmate. And in less than 24 hours I was raped. There would have been no time to fill out a request slip requesting a grievance form then waiting days to receive the actual grievance form to address the issue because by then it would have been too late.

This was a time sensitive matter and "available" administrative remedies (of the filed request slip(s)/grievance form(s)) were exhausted, as no other administrative remedies were available within the time frame the event (rape) transpired.

## IV Statement of Claim.

More briefly. While in the Protective Custody unit, I informed Correctional Officers verbally and in writing on a filed request slip/grievance form that if I were to be moved into a cell with another inmate that I would be raped by that inmate, because I have been threatened before. The Correctional Officers and Supervising Correctional Officers reviewed and disregarded my request slip(s)/grievance form(s) and moved me in with the rapist inmate anyway. I was raped by the rapist inmate in less than 24 hours. (During my stay in MCLCF's PC unit for about 1 year, multiple inmates threatened to rape me if I were moved in with them)

Extra Sheets continued for Jonathan Brownlee III's  
Civil Rights Complaint form v. MCF

The approximate date and time of the event giving rise to my claim is documented in request slip(s), grievance form(s), and the police report.

This information is unknown to (me) the Plaintiff at the present time, reference must be made to those documents for the requested approximate date and time of the (rape) event. (Copies of the request slip(s) and grievance form(s) must be requested from Monroe County Correctional Facility and a copy of the police report must be requested from the police department that Services Monroe County Correctional Facility in Stroudsburg, PA.

Monroe County Correctional Facility employed Correctional Officers who were not trained properly, or disregarded their training in order to perform the duties of their employment, which is to protect inmates properly when informed "a danger to an inmate safety exists".

JONATHAN A. BROWNLEE

Name: Jonathan A. Brownlee  
Lackawanna County Prison  
1371 N Washington Avenue  
Scranton, PA 18509-2840

RECEIVED  
SCRANTON

29 JUN 2018

A  
DEPUTY CLERK  
PER

Clerk of Court  
United States Courthouse  
235 N. Washington Ave.  
Scranton, PA 18501

